

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

TRAVELERS CASUALTY AND SURETY)
COMPANY OF AMERICA,)

Plaintiff,)

vs.)

CASE NO.: 1:08-cv-50008

YOUNG CONSTRUCTION & PAVING,)
LLC, KAREN B. YOUNG, GORDON T.)
YOUNG, JEFFREY D. YOUNG, MONICA L.)
YOUNG, JOSEPH WELLS, TERRI WELLS,)
LUKE D. VANDER BLEEK and JOAN L.)
VANDER BLEEK,)

Defendants.)

RESPONSE TO MOTION FOR PRELIMINARY INJUNCTION

NOW COME the Defendants, YOUNG CONSTRUCTION & PAVING, LLC,
KAREN B. YOUNG, GORDON T. YOUNG, JEFFREY D. YOUNG and MONICA L.
YOUNG, by their attorneys, BARRICK, SWITZER, LONG, BALSLEY & VAN EVERA,
and as their response to the Motion for Preliminary Injunction filed by the Plaintiff herein,
states as follows:

1. The Defendants deny the allegation of the Plaintiff in its Complaint that it will suffer a loss of \$600,000.00, and the Plaintiff has provided an accounting of its alleged loss.
2. The Motion for Preliminary Injunction seeks to bar the Defendants from transferring any assets, which would adversely affect the rights of creditors entitled to payments, including Sauk Valley Bank, a secured creditor, and indebtedness due to the Internal Revenue Service.
3. The Plaintiff has adequate remedies at law, including its complaint for breach of Contract as set forth in Count I of the Complaint filed herein.

WHEREFORE, the Defendants move the Court to deny the Plaintiff's Motion for Preliminary Injunction.

BARRICK, SWITZER, LONG,
BALSLEY & VAN EVERA

By:

/s/Stephen G. Balsley

STEPHEN G. BALSLEY

Stephen G. Balsley – 0104841
**BARRICK, SWITZER, LONG,
BALSLEY & VAN EVERA**
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FOR THE NORTHERN DISTRICT OF ILLINOIS
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LUKE D. VANDER BLEEK and JOAN L.
VANDER BLEEK,

Defendants.

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NOTICE OF FILING

I HEREBY CERTIFY that on February 27, 2008, I electronically filed the foregoing **Response to Motion for Preliminary Injunction** with the Clerk of the United States District Court, Northern District of Illinois, for the Western Division, using the CM/ECF system, that I have served all CM/ECF Registered Participants, as reflected on the Notice of Electronic Filing and that I have served all non CM/ECF participants by mailing a copy via first-class U.S. Mail, with proper postage prepared and affixed thereon, on February 27, 2008.

/s/Stephen G. Balsley
STEPHEN G. BALSLEY

PROOF OF SERVICE

I HEREBY CERTIFY that on February 27, 2008, I have served all CM/ECF Registered Participants as reflected on the Notice of Electronic Filing and that I have served all non CM/ECF participants by mailing a copy via first class U.S. Mail, with proper postage prepared and affixed thereon, on February 27, 2008.

/s/Stephen G. Balsley
STEPHEN G. BALSLEY

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